

Congress of the United States
Washington, DC 20515

March 7, 2022

The Honorable Joseph R. Biden
President of the United States
The White House
1600 Pennsylvania Ave N.W.
Washington, DC 20500

Dear Mr. President:

In the wake of Russia's criminal invasion of Ukraine, we write to urge your administration to invoke existing authorities to, where appropriate, investigate, seize, and sanction assets belonging to Russian oligarchs and kleptocrats who are complicit in Vladimir Putin's tyranny and egregious acts of crime and corruption around the world. We also encourage your administration to work with Congress on legislation that would enable the Executive Branch to liquidate targeted assets for use toward humanitarian aid and reconstruction in Ukraine, while maintaining necessary legal and constitutional protections.

We believe the existing financial sanctions imposed by your administration, the European Union (EU) and other countries, are steps in the right direction. During your State of the Union address, you announced the establishment of a task force to enforce sanctions on Russian oligarchs. This, in addition to the White House's recent joint statement with EU members and others expressing a commitment to identifying and freezing assets belonging to Russian oligarchs, are meaningful announcements. We are also encouraged by the administration's decision last week imposing full blocking sanctions and visa restrictions on an expansive list of Russia elites and their family members that enable Putin, as well as full blocking sanctions on disinformation targets.

We are hopeful that the administration will take further action to devastate the Russian economy and its oligarchs. To that end, we request that you use existing authorities, outlined below, to target Russian oligarchs' ill-gotten wealth, of which more than half is estimated to be held offshore:¹

- The Department of Justice (DOJ)'s Money Laundering and Asset Recovery Section (MLARS)'s Kleptocracy Asset Recovery Initiative, which aims to recover proceeds of foreign official corruption within the U.S., or which used the US financial system, through investigations and litigation.² According to the Congressional Budget Office, the Initiative has helped repatriate over \$150 million in assets lost to foreign corruption.³

¹ <https://www.theatlantic.com/ideas/archive/2022/02/russia-sanctions-punish-rich-oligarchs/622933/>

² <https://www.justice.gov/criminal-mlars>

³ <https://www.cbo.gov/publication/55113>

- The Global Magnitsky Act (P.L. 112-108) and its implementing authority, Executive Order 13818, which authorizes asset-blocking sanctions for individuals engaged in corruption.⁴
- The Support for the Sovereignty, Integrity, Democracy, and Economic Stability of Ukraine Act of 2014 (P.L. 113-95), as amended by P.L. 115-44 (§227), which authorizes asset-blocking sanctions on Russian officials responsible for significant acts of corruption within Russia or elsewhere and individuals who materially assist or provide support for such corruption.
- The Financial Crime Enforcement Network (FinCEN)'s Geographic Targeting Order, pursuant to 31 U.S. Code 5326, which requires U.S. title insurance companies to identify the natural persons behind shell companies used in all-cash purchases of residential real estate.
- The Combating Russian Money Laundering Act, which was signed into law as part of the fiscal year 2020 National Defense Authorization Act (P.L. 116-92). This law requires a report identifying "additional regulations, statutory changes, enhanced due diligence, and report requirements that are necessary to better identify, prevent, and combat money laundering linked to Russia," which was due January 2022 but has yet to be completed.

We also urge your administration to work with our allies and partners to utilize and, if necessary, strengthen existing authorities to investigate and seize offshore wealth belonging to Russian oligarchs and kleptocrats that may have been obtained through corrupt means. We believe your administration should actively support and promote efforts such as London Mayor Sadiq Khan's call to expropriate the \$1.1 billion worth of real estate in his city belonging to Russian oligarchs.⁵

The catastrophic war in Ukraine should serve as a moment of reckoning for Western countries who have, wittingly or not, provided harbor for Russian kleptocrats and oligarchs who enable President Putin's evil and corrupt regime. Taking steps to investigate, seize, and otherwise sanction these assets will send a clear and long overdue message to Putin's cronies that they and their ill-gotten property are no longer welcome.

Sincerely,




Peter Meijer
Member of Congress



William Keating
Chairman
Subcommittee on Europe, Energy,
Environment, and Cyber
House Foreign Affairs Committee

⁴ <https://www.csce.gov/international-impact/publications/sanctioning-human-rights-abusers-and-kleptocrats-under-global>


⁵ <https://www.politicshome.com/news/article/mayor-khan-russian-london-property>




John Curtis
Member of Congress




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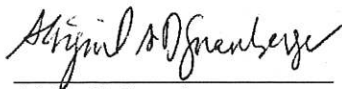
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cc:

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